

Shawn R. Perez, Esq.
Nevada Bar No. 10421
Law Offices of Shawn R. Perez
7121 W. Craig Road, #113-38
Las Vegas, Nevada 89129
(949) 492-9545 Telephone
(702) 485-3977 Telephone
shawn711@msn.com

Ariel Mitchell, Esq. (*pro hac vice*)

The Law Office of Ariel Mitchell, P.A.

500 NW 2nd Ave. #12864

Miami, FL 33101

Tel: (305) 903-5835

ariel@arielesq.com

Attorneys for Plaintiff Ashley Parham

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

ASHLEY PARHAM,

Case No.: 24-cv-07191-RFL

Plaintiff,

)

CASE MANAGEMENT

SEAN COMBS a/k/a)

“P. Diddy,” “Puff Daddy,” “Love,”)

“Puffy” and “Diddy.”

Kristina Khorram.

Shane Pearce

1 John Does 1-3 and)
2 Jane Doe,)
3 Defendants.

4 Plaintiff to the above-entitled action submits this CASE MANAGEMENT STATEMENT
5 & PROPOSED ORDER pursuant to the Standing Order for All Judges of the Northern District
6 of California and Civil Local Rule 16-9.

7 1. Jurisdiction & Service

8 This Court has subject matter jurisdiction in this case under Diversity jurisdiction because none
9 of the Plaintiffs live in the same state as any of the Defendants AND the amount of damages is
10 more than \$75,000.00.

11 2. Service

12 At this time none of the Defendants have been served mainly because Plaintiff has been
13 conducting further investigation which has led to information that will require Plaintiff to amend
14 its complaint.

15 3. Facts

16 This case is regarding a brutal sexual assault and abuse via drugging and gang rape engaged in
17 by Defendants. This case is also about the conspiracy of the Defendants to engage in the rape and
18 drugging of the Plaintiff.

19 4. Legal Issues

20 The Legal issues in this case include RICO, sexual battery, sexual assault, sexual harassment,
21 battery, assault, negligence, intentional and negligent infliction of emotional distress, unjust
22 enrichment, aiding and abetting, trafficking and victims protection act, inducing a sex trafficking
23 venture, knowing beneficiary in a sex trafficking venture, obstruction of the enforcement of the
24 trafficking victim protection act and false imprisonment.

25 5. Motions

26 There are no current or pending Motions. Plaintiff has received a proposed Motion for Rule 11
27 Sanctions from Defendant Khorram despite Defendant not being served at this time.

6. Amendment of Pleadings

Plaintiff intends to amend its pleadings on or by February 14, 2025.

7. Evidence Preservation

Plaintiff certifies it has reviewed the Guidelines Relating to the Discovery of Electronically Stored Information (“ESI Guidelines”), and parties have yet to meet and confer pursuant to Fed. R. Civ. P. 26(f) regarding reasonable and proportionate steps taken to preserve evidence relevant to the issues reasonably evident in this action.

8. Disclosures

Parties have not yet sent each other Initial Disclosures, but agree to exchange them soon after the amended complaint is filed.

9. Discovery

To date parties have not exchanged any discovery. Plaintiff believes discovery will be significant given the number of Defendants and the claims enumerated in the Complaint. At this time there are not any proposed limitations or modifications of the discovery rules. Parties have not yet agreed but will consider entering a stipulated e-discovery order and proposed discovery plan once the Complaint is amended and Defendants are served. At this time no discovery disputes are known.

10. Class Actions

Not applicable.

11. Related Cases

Plaintiff is not aware of any related cases.

12. Relief

Plaintiff seeks monetary damages approximately of \$50,000,000.00. That amount was calculated based on the damage inflicted on Plaintiff and the necessary treatment for Plaintiff for her life. At this time there are no counterclaims from Defendant.

13. Settlement and ADR

Plaintiff is open to the prospects of Settlement, but it does not seem Defendants share that same sentiment.

14. Consent to have a Magistrate Judge Hear the Case

Plaintiff consents to a magistrate judge for all pre-trial matters.

15. Other References

| Not Applicable.

16. Narrowing of Issues

Not Applicable.

17. Expedited Trial Procedure

Not Applicable.

18. Scheduling

Plaintiff agrees to have Court set deadlines.

19 Trial

This case will be tried by a jury. The trial is expected to last seven (7) days.

20. Disclosure of Non-party Interested Entities or Persons

None.

21. Other

None.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed via Pacer and served by the Clerk's maintained website via e-service to all parties of record.